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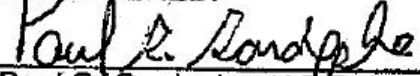
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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: June 2, 2021

Date: June 1, 2021

The Honorable Paul G. Gardephe
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: People v. United States v Michael McCants, 19 Cr.235 (PGG)

Dear Judge Gardephe:


The Defendant submits this letter at the request of U.S. Pretrial Services Intensive Supervision Specialist Mr. Jonathan Lettieri (see email attached). We are requesting that Mr. McCants' bail be modified to remove the home detention condition to be replaced with a curfew, enforced by continued location monitoring, with the hours to be set at the discretion of Pretrial Services.

Mr. McCants has regained compliance with his bail conditions. He has continued attending the SAVE program and has obtained employment with a set of restaurants, Kiosk located at 80 East 116th Street, and Adar Lounge located at 1637 Park Avenue each located in New York County. His employer is Mr. Mounir Nadj. Mr. Nadj has found Mr. McCants to be a valuable employee and requests that Mr. McCants work last minute late second shifts at his job which cannot always be accommodated under his home detention condition.

To help facilitate his work Pretrial Services and Defendant request that Mr. McCants' bail be modified to remove the home detention condition as described above.

The Government consents with this request.

Respectfully, submitted



Harold B. Ramsey, Jr. Esq.

Cc : (AUSA) Sheb Swett (By email)

From: Jonathan Lettieri Jonathan.Lettieri@nyspt.uscourts.gov
Subject: Michael McCants, 19 Cr. 235-1 (PGG)
Date: May 25, 2021 at 8:59 PM
To: haroldramseyjr@aol.com

Good evening, Harold:

Mr. McCants has regained compliance with his bail conditions. He has continued attending the SAVE program and has obtained employment. He regularly requests to work last-second shifts at his job which I cannot always accommodate under his home detention condition. To help facilitate his work, it would make sense to modify his bail to a curfew. Therefore, I am respectfully asking that you submit a request to the Court asking that his bail be modified to remove the home detention condition, to be replaced with a curfew, enforced by continued location monitoring, with the hours to be set at the discretion of Pretrial Services.

Please reach out with any questions. Thanks.

Jonathan Lettieri
Intensive Supervision Specialist
U.S. Pretrial Services
Southern District of New York
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